REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed May 3, 2007. Claims 4-77 were pending in the present application. This Amendment amends claims 4-8, 12, 15-17, 19-21, 29-31, 38, 41, 45, 60, 62, and 71; and cancels claims 13-14, 18, 32-37, 49-59, 65-70, and 75-77; leaving pending in the application claims 4-12, 15-17, 19-31, 38-48, 60-64, and 71-74. Reconsideration of the rejected claims is respectfully requested.

I.   Objection to the Claims

Claims 4, 7, 15, 21, 29, 37, 49, 55, 60, 65, 71, 75-76, and 77 are objected to for containing various informalities, awkward phrasing, and grammatical errors. Applicants appreciate the Examiner's careful attention to detail. These claims as amended should no longer contain the language to which the Examiner objected, and should recite proper phrasing and grammar. Applicants therefore respectfully request that the objection to the claims be withdrawn.

II.   Provisional Double Patenting Rejection

Claims 5, 7, 21, 60, 65, and 71 are provisionally rejected under the judicially created doctrine of double patenting as being obvious over claims 4, 44, 66, 72, and 81 of co-pending U.S. Patent Application No. 10/041,015 in view of *Beauchamp*. It is respectfully submitted that the pending claims as amended are patentably distinct from these claims. For example, claim 4 of the '015 application relates to customizing a view all command of a specific application interface. Claim 4 does not recite customizing data for an interaction <u>model</u> that can be used to provide for personalized interaction with <u>any</u> application user interface using that model as specified by the user, independent of the type of interface as recited in the rejected claims. Further, as discussed below, *Beauchamp* relates to a specific set of user interface pages and does not teach or suggest a model that can be used to generate any application interface and ensure the personalized interaction functionality. As such, these claims are patentably distinct from the

Appl. No. 10/041,034
Amdt. dated August 1, 2007
Reply to Office Action of May 3, 2007

PATENT

cited references and it is respectfully submitted that a terminal disclaimer is not necessary even when the allowed claims of the application issue.

III.   Rejection under 35 U.S.C. §112

Claims 4-6 and 37 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In particular, these claims are rejected for their recitation of a "user interface tool" with the associated phrasing. Applicants respectfully submit that the language which the Examiner rejected is no longer contained in the claims, and the claims as amended are sufficiently definite. Applicants therefore respectfully request that the rejections with respect to claims 4-6 and 37 be withdrawn.

IV.   Rejection under 35 U.S.C. §102

Claims 4-27 and 29-77 are rejected under 35 U.S.C. §102(e) as being anticipated by *Beauchamp* (US Patent No. 6,621,505). Applicants respectfully submit that *Beauchamp* does not disclose each element of these claims.

For example, Applicants' claim 4 as amended recites a system for generating application user interfaces having a customized user interaction, comprising:

> a personalization server including a personalization engine and operable to deliver a user profile interface to a user, the personalization system being further operable to allow the user to modify personalization data for that user through the user profile interface, the **personalization data characterizing a customizable interaction model for use with a plurality of application user interfaces**;
> an Internet application server operable to execute a selected Internet application of the plurality of Internet applications including a selected application user interface, the **Internet application server including a user interface generator operable to generate markup language including the selected application user interface using metadata for the selected application user interface, the customizable interaction model, and the personalization data for the user, in order to include the customized interaction with the selected application user interface**;
> a data repository including a data record for storing the personalization data, the data record being accessible using the metadata; and
> a web server operable to deliver the generated markup language for the selected application interface to a client device for the user,
> wherein **the customizable interaction model is usable by each plurality of Internet applications to provide the customizable interaction characterized by the personalization of**

Appl. No. 10/041,034
Amdt. dated August 1, 2007
Reply to Office Action of May 3, 2007

PATENT

> **the user independent of the type of application user interface used by that Internet application**

(*emphasis added*). Such limitations are not disclosed by *Beauchamp*.

Beauchamp discloses the designing and implementing of integrated enterprise processes on computer systems using a plurality of "predefined, standardized user-interface screens", (col. 1, lines 11-15; col. 4, lines 23-33). This "set of standard screens" can be employed through a universal client as building blocks to construct a business process (col. 9, lines 26-29) The users can modify this "limited number of standard screens" by, for example, setting a preferred language or color preference (col. 7, lines 33-38; col. 12, lines 33-36).

Applicants' claim 4, on the other hand, recites use of a customizable interaction model that can be used with <u>any</u> appropriate application interface, simply by using the model and the user personalization data at the time of generation of the interface in response to a user request. The user-selected functionality then can be incorporated in multiple interfaces for multiple applications, regardless of the type of interface. Further, such an approach does not rely on a set of predetermined screens and restrict the applications to using those screens. As *Beauchamp* does not disclose or suggest such functionality, *Beauchamp* cannot anticipate or render obvious Applicants' claim 4 or the claims that depend therefrom. The other claims recite limitations that similarly are not disclosed or suggested by *Beauchamp* for reasons including those cited above, such that these claims also cannot be anticipated or rendered obvious by *Beauchamp*.

Applicants therefore respectfully request that the rejections with respect to claims 4-27 and 29-77 be withdrawn.

V.   Rejection under 35 U.S.C. §103

Claim 28 is rejected under 35 U.S.C. §103(a) as being obvious over *Beauchamp* in view of *Helgeson* (US 6,643,652). Claim 28 is not rendered obvious by *Beauchamp* as discussed above. *Helgeson* does not make up for the deficiencies in *Beauchamp* with respect to this claim. *Helgeson* teaches approaches to integrating disparate business application systems across multiple hardware platforms (col. 1, lines 34-40), and is cited as teaching a client machine being a wireless device (OA. p. 31). Such teaching, however, still would not make up for the

deficiencies in *Beauchamp* with respect to claim 28, as *Helgeson* still fails to teach or suggest use of a customizable interaction model that can be used with <u>any</u> appropriate application interface, simply by using the model and the user personalization data at the time of generation of the interface, whereby the user-selected functionality can be incorporated in multiple interfaces for multiple applications, regardless of the type of interface. Further, there is no motivation in either reference to provide such functionality. As such, *Helgeson* cannot render obvious Applicants' claim 28, either alone or in combination with *Beauchamp*. Applicants therefore respectfully request that the rejection with respect to Applicants' claim 28 be withdrawn.

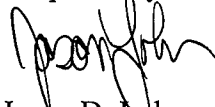## VI.   Amendment to the Claims

Unless otherwise specified or addressed in the remarks section, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

Jason D. Lohr
Reg. No. 48,163

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 925-472-5000
Fax: 415-576-0300
JDL:slh   61112413 v1